

ORIGINAL

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
(OCA/USPS-15-20)  
(August 8, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

*Gail Willette*

GAIL WILLETTE

Director

Office of the Consumer Advocate

*Emmett Rand Costello for*

SHELLEY DREIFUSS

Attorney



OCA/USPS-15. Please refer to the response to OCA/USPS-T5-7e. This response states that attrition affected nine sample routes during FY 95.

- a. Please describe the procedure for selecting replacement routes for routes subject to attrition. If written instructions for this procedure exist, please include them in your response.
- b. Please explain the advantage of not using a randomized procedure for replacement of routes subject to attrition.
- c. Please provide comparisons between characteristics of routes subject to attrition and their replacements. For example, for each attrited route and its replacement, provide route characteristics such as number of stops (by stop type), route volume, CAG, and route type.
- d. Please explain how the 18 affected routes (both the attrited and replacement routes) can be identified on the FY95 CCS data set.

OCA/USPS-16. Please refer to the response to OCA/USPS-T5-d. This response states that there is a small number of routes that have parts. Please provide the total number of universe and sample routes having multiple parts.

OCA/USPS-17. Refer to the transcript of the proceedings of the July 12, 1994, meeting of the Board of Governors, pages 9-27, concerning mail forwarding. Please confirm that the Board of Governors has adopted a postal management proposal to assess a fee for the forwarding of mail and/or change of address orders.

- a. If you do not confirm, please explain the extent of the Board of Governors' consideration of assessing a fee for mail forwarding and/or change of address orders.
- b. Please provide information on the status of any Postal Service work undertaken to date concerning assessing a fee for the forwarding of mail and/or change of address orders.
- c. Please provide the results (or interim results) of any Postal Service work undertaken to date concerning assessing a fee for the forwarding of mail and/or change of address orders.

OCA/USPS-18. Refer to the transcript of the proceedings of the July 12, 1994, meeting of the Board of Governors, page 18, lines 8-12, concerning the cost study for undeliverable as addressed mail. Please provide a copy of the Price Waterhouse study.

OCA/USPS-19. Refer to the transcript of the proceedings of the July 12, 1994, meeting of the Board of Governors, page 24, lines 8-10, concerning the cost of forwarding mail. Please confirm that the "total cost of forwarding mail is slightly over 23 cents a piece." If you do not confirm, please provide the correct figure and the data and calculations used to derive it.

OCA/USPS-20. Refer to the transcript of the proceedings of the July 12, 1994, meeting of the Board of Governors, page 12, lines 8-11, concerning the volume of forwardable mail. Please confirm that forwardable mail volume is estimated to be over 5 billion pieces per year. If you do not confirm, please provide the correct figure and the data and calculations used to derive it.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.

*Emmett Rand Gisteh*  
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Washington, D.C. 20268-0002  
August 8, 1996